

- IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Evidence and serve expert disclosures and provide reports on or before April 22, 2021.

- Plaintiff shall provide full signed responses to Defendant's First Interrogatories and Requests for Production of Documents and provide their testifying experts' reports under Rule 26 on or before June 22, 2021.
- Plaintiff shall provide three (3) potential dates for the deposition of Plaintiff by June 22, 2021 to occur in July of 2021.
- Defendant shall disclose the identity of any person who may be used at trial to present evidence under Rules 701, 702, 703, or 705 of the Federal Rules of Evidence and serve expert disclosures and provide reports on or before August 20, 2021.
- In the event a Defendant designates experts where Plaintiff did not, Plaintiff shall disclose and provide reports for any rebuttal experts on or before September 20, 2021.
- Discovery period shall expire on **October 20, 2021**.

SECTION 2: Subjects on Which Discovery May Be Needed.

The parties anticipate conducting discovery on the elements of negligence, negligent entrustment, negligent hiring and retention, agency, breach, proximate causation, and damages including but not limited to anything which may lead to the issues discoverable. Specifically, the parties will focus on the facts surrounding the subject motor vehicle accident, the claimed damages, and whether the claimed damages are causally related to the accident.

The parties do not anticipate that discovery needs to be conducted in phases. The parties do not anticipate any issues regarding the production of electronically stored information, which will be produced in PDF or other widely available format.

The parties anticipate conducting depositions of the following persons on the following tentative dates:

- Plaintiff Vickie Curry on June 18, 2021 at 10 a.m. CDT via Zoom (due to Covid-19) and/or in person;
- Witness Kevin D. Lewis on June 18, 2021 at 10 a.m. CDT via Zoom (due

- to Covid-19) and/or in person;
- Defendant Gayle A. Jasper on June 24, 2021, at 10 a.m. CDT via Zoom (due to Covid-19) and/or in person;
- Corporate representative of Landstar Ranger, Inc. on June 24, 2021 at 10 a.m. CDT via Zoom (due to Covid-19) and /or in person;
- Any experts identified by the parties will be scheduled once identified via Zoom and/or in person.

The estimated cost of all discovery is as follows:

- Plaintiff estimates \$25,000 to \$45,000, depending on the number of expert witnesses.
- Defendants estimate \$25,000 to \$45,000, depending on the number of expert witnesses.

SECTION 3: Dispositive/Daubert Motions.

Dispositive motions, *e.g.*, motions for summary judgment, shall be filed no later than **December 3, 2021**. Briefs in response shall be due within 21 days of the initial motion. The movant shall thereafter have 14 days to reply.

If no summary judgment motion is filed, then Daubert motions shall be filed by **December 27, 2021**. If a summary judgment motion is filed, then Daubert motions shall be filed by the deadline for motions in limine as set in an order for pretrial conference or within 21 days after the Court's ruling on the last pending motion for summary judgment, whichever is earlier.

SECTION 4: Pretrial Disclosures.

Pretrial Disclosures pursuant to Rule 26(a)(3) shall be made at least 30 days prior to any trial date set by the Court, with any objections to be filed within 14 days afterward.

SECTION 5: Other Orders

The parties do not anticipate the need for any other orders under Rule 26(c) or Rule 16(b) at this time.

SECTION 6: Diversity of Citizenship

- Plaintiff is a citizen of Moundville, Alabama;
- Defendant Jasper is a citizen of Georgia;
- Defendant Landstar Ranger, Inc. is a Delaware corporation with its principal place of business in Florida, and is therefore a citizen of Delaware and Florida.

BY THE COURT: In light of the agreements reached by the parties in this amended scheduling order, the Court finds that Defendants' motion to compel (ECF No. 17) is moot.

Submitted by:

Byron McMath

Byron McMath

Attorney for the Plaintiff

Date: 6/14/21

/s/ Quinn Curtis Bennett

Quinn Curtis Bennett

Attorney for Defendants

Date: 6/14/21

:

SO ORDERED, this 15th day of June, 2021

S/Clay D. Land

CLAY D. LAND,

UNITED STATES DISTRICT JUDGE